

A pre-motion conference will be held on November 20, 2013 at 10:30 am. Plaintiff is directed to serve the Defendant J.K. Scanlon Company Inc. with a copy of this order at it's last known address. Defendant J.K. Scanlan Company, Inc. is directed to submit a written response no longer than 3 pages by November 13, 2013.  
SO ORDERED:

HON. EDGARDO RAMOS, U.S.D.J.

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NEW YORK AND NEW JERSEY

November 1, 2013

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**VIA FACSIMILE (212-805-7943)**

Hon. Edgardo Ramos, U.S.D.J.  
United States Courthouse  
40 Foley Square, Room 619  
New York, New York 10007

**Re: *Shawnlee Construction, LLC v. J.K. Scanlan Company, Inc. et ano.***  
**Case No. 7:12-cv-03346-ER**

***Shepardville Construction, LLC v. J.K. Scanlan Company, Inc. et ano.***  
**Case No. 7:12-cv-03347-ER**

Dear Judge Ramos:

We represent plaintiffs Shawnlee Construction, LLC ("Shawnlee") and Shepardville Construction, LLC ("Shepardville") (collectively, the "Plaintiffs") in the above referenced related matters. In accordance with Procedure 2.A.ii of the Court's Individual Practices, Plaintiffs respectfully request a pre-motion conference in connection with their proposed motions for a default judgment against defendant J.K. Scanlan Company, Inc. ("JKS").

By way of background, Plaintiffs commenced both cases by filing a summons and complaint on April 26, 2012. On October 19, 2012, Shawnlee filed its Second Amended Complaint, which was duly served upon JKS on October 23, 2012. On June 18, 2012, Shepardville filed a Third Amended Complaint, which was duly served upon JKS two days later on June 20, 2012.

To date, JKS has not appeared or responded in either of the above cases, and the its time to do so has long since expired. Plaintiffs wish to move the Court to enter a default judgment on the basis that JKS has failed to appear or answer prior to the expiration of the answering deadline. I am available for a conference at the Court's earliest convenience. Thank you.

Respectfully submitted,

George Sitaras

cc. Lawrence Novak, Esq. (via email)  
J.K. Scanlan Company, Inc. (via FedEx)